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8 **UNITED STATES BANKRUPTCY COURT**
9 **DISTRICT OF NEW JERSEY**

10 IN RE:

Case No.: 22-17272-RG

11 MICHAEL ERVIN,

12 DEBTOR.

CERTIFICATION IN SUPPORT OF
MOTION TO VACATE ORDER OF
DISMISSAL

13
14 Avram D. White, Esq. respectfully says as follows:

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- 16 1. I serve as counsel to the debtor in the above referenced bankruptcy case.
 - 17 2. The instant Chapter 13 case was filed on September 14, 2022.
 - 18 3. The Chapter 13 case was confirmed on March 15, 2023.
 - 19 4. A condition of confirmation was that a Pre-Confirmation Certification be filed
 - 20 prior to April 5, 2023.
 - 21 5. The Pre-Confirmation Certification was not executed prior to that date and counsel
 - 22 to the debtor did not file an application to the Court to modify the confirmation order and
 - 23 the aforementioned deadline. As a result, the Chapter 13 case was dismissed on April 8,
 - 24 2023.
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1 6. The Pre-Confirmation Certification has now been filed and there is a change in
2 circumstances wherein the reasons for the dismissal no longer exist.

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4 7. The debtor is easily able to prosecute his Chapter 13 case going forward.

5 8. The debtor was current prior to the dismissal with his trustee payments.

6 9. The debtor needs this case to continue to complete a financial reorganization.

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8 10. For each of the foregoing reasons, it is respectfully requested that the Court enter
9 the accompanying Order vacating the dismissal of this case.

10 11. I certify the facts set forth in this Certification are true. I understand if this
11 certification contains willfully false statements, I am subject to punishment.

12
13 May 10, 2023

/s/ Avram D. White

Attorney Name